

reporting that it is not Phase 2-compliant with respect to GSM operations in that area. As to each of these GSM operations: (a) the GSM system is a roam-only, carriers' carrier system serving incoming roamer traffic, with local subscribers, if any, being on the co-contour CDMA network that is Phase 2-compliant; (b) the reason for the inability to be Phase 2-compliant for GSM is insufficient triangulation; (c) all of these GSM operations are in remote areas; and (d) the local PSAP(s) are aware of the GSM system being only Phase 1-compliant and have no objection.

These GSM operations are places where Commnet has few cell sites. Even where the table appears to show a larger number of sites, such as Pima County, Arizona, the number of sites must be put into context with the area being served. For example, Pima County, home to the city of Tucson, Arizona, has a total land area of 9,187 square miles, of which the Tucson populated area covers only about 1,500 square miles. (Commnet is *not* licensed for and does not cover the city of Tucson or any suburbs thereof.) The rest of Pima County, on the other side of the Sierrita Mountains from Tucson and its suburbs, consists of the Sonoran Desert, the Buenos Aires and Cabeza Prieta National Wildlife Refuges, Organ Pipe Cactus National Monument, and the Tohono O'odham Indian Reservation. This wild, sparsely populated and remote area, larger by far than the state of Connecticut (which has a land area of only 4,485 square miles), presents a challenge to serve at all, and Commnet's widely-spaced sixteen GSM cell sites have virtually no triangulation potential, as the local PSAP has recognized.

Respectfully submitted,

By: 
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July 28, 2011

Rini Coran, PC
1140 19th Street NW, Suite 600
Washington, DC 20036

DECLARATION OF MARK HANSEN

I, Mark Hansen, declare under penalty of perjury that:

I am the Vice President, Network Operations, for Commnet Wireless, LLC and its subsidiaries, as well as for its commonly-owned affiliates Choice Communications, LLC and SAL Spectrum, LLC (collectively, "Commnet"). I am the individual who serves as the chief contact person with oversight responsibility for monitoring the overall status of location accuracy compliance under Section 20.18(h) for Commnet. I have read the foregoing July 28, 2011 E911 Exclusion Report for Commnet, including the table attached thereto. All facts set forth therein are true and correct, to the best of my knowledge, information and belief.

My business address and phone number are: 1562 Park Street, Castle Rock, CO 80102, Tel. 720-733-5388

Executed as of July 28, 2011.



Mark Hansen

Exclusion Report - E911

Commnet Deployment

County	Technology	Phase	Compliant	P1 Complete	P2 Complete	PSAP Name	P1 Sites	P2 Sites	Total Sites	Notes
Arizona										
Cocconino-Page	CDMA_GSM	2	NO	2/3/09	7/15/09 CDMA	Page Police Dept	6	5	6	Phase 2 compliant CDMA but not GSM
Pima	CDMA_GSM	2	NO	7/28/10	6/17/10 CDMA	Pima County Sheriff	16	14	17	Phase 2 compliant CDMA but not GSM
Yavapai	CDMA_GSM	2	NO	2/8/10	2/10/10	Yavapai County Sheriff	3	3	4	Phase 2 compliant CDMA but not GSM
California										
Inyo	CDMA_GSM	2	NO	1/27/11	1/27/11	Inyo County Sheriff	1	1	1	Phase 2 compliant CDMA but not GSM
Colorado										
Chaffee	GSM	2	NO	7/13/10		Chaffee County Sheriff	2		2	Phase 1 accuracy only.
Elbert	CDMA_GSM	2	In Progress			Douglas County Sheriff	5	5	5	deployment completed in appx 6 mo
Gunnison	CDMA_GSM	2	NO	7/14/10	7/14/10	Gunnison County Communications	7	6	7	Phase 2 compliant CDMA but not GSM
Lake	CDMA_GSM	2	NO	7/15/10	7/15/10	Lake County Sheriff	1	1	1	Phase 2 compliant CDMA but not GSM
LaPlata	CDMA_GSM	2	NO	6/2/08	11/3/09	La Plata County -Durango	6	9	15	Phase 2 compliant CDMA but not GSM
Montrose	CDMA_GSM	2	NO	9/22/09	9/22/09	Montrose Emergency Tele Authority	2	2	2	Phase 2 compliant CDMA but not GSM
Park	CDMA_GSM	2	NO	10/7/08	6/30/05	Park County Communications Center	10	9	10	Phase 2 compliant CDMA but not GSM
Kansas										
Allen	GSM	2	NO	7/20/09		Iola-Allen County 911	4	0	4	Phase 1 accuracy only.
Anderson	GSM	2	NO	11/10/09		Anderson County Dispatch Center	2	0	2	Phase 1 accuracy only.
Bourbon	GSM	2	NO	1/11/10		Fort Scott Police Department	4	0	4	Phase 1 accuracy only.
Chase	GSM	2	NO	6/29/09		Chase County Sheriff	2	0	2	Phase 1 accuracy only.
Clay	GSM	2	NO	4/26/10		Clay County Sheriff	2	0	2	Phase 1 accuracy only.
Cloud	GSM	2	NO	7/1/09		Concordia City Police Department	4	0	4	Phase 1 accuracy only.
Coffey	GSM	2	NO	1/16/09		Coffey County Sheriff	2	0	2	Phase 1 accuracy only.
Cowley	GSM	2	NO	3/8/10		Winfield Police Department and Arkansa	5	0	5	Phase 1 accuracy only.
Crawford	GSM	2	NO	7/28/09		Crawford County Sheriff	1	0	1	Phase 1 accuracy only.
Dickinson	GSM	2	NO	6/8/09		Dickinson County Emergency Communc	3	0	3	Phase 1 accuracy only.
Elk	GSM	2	NO	3/8/10		Elk County Emergency	1	0	1	Phase 1 accuracy only.
Franklin	GSM	2	NO	11/10/09		Franklin County Sheriff	1	0	1	Phase 1 accuracy only.
Greenwood	GSM	2	NO	10/12/09		Greenwood County Sheriff	4	0	4	Phase 1 accuracy only.
Harper	GSM	2	NO	6/29/09		Harper County Communications	2	0	2	Phase 1 accuracy only.
Kingman	GSM	2	NO	10/5/09		Kingman County Sheriff	2	0	2	Phase 1 accuracy only.
Linn	GSM	2	NO	3/15/10		Linn County Sheriffs Office	4	0	4	Phase 1 accuracy only.
Lyon	GSM	2	NO	10/12/09		Emporia Police Dept	1	0	1	Phase 1 accuracy only.
Marion	GSM	2	NO	6/29/09		Marion County Communications	4	0	4	Phase 1 accuracy only.
Marshall	GSM	2	NO	2/15/10		Marshall County Sheriff	3	0	3	Phase 1 accuracy only.
Miami	GSM	2	NO	2/20/09		Miami County Sheriff	6	0	6	Phase 1 accuracy only.
Mitchell	GSM	2	NO	7/1/09		Mitchell County Communications	1	0	1	Phase 1 accuracy only.
Morris	GSM	2	NO	7/29/09		Morris County Sheriff	2	0	2	Phase 1 accuracy only.
Nemaha	GSM	2	NO	3/22/10		Nemaha County Sheriff	1	0	1	Phase 1 accuracy only.
Reno	GSM	2	NO	3/1/10		Hutchinson-Reno 911	5	0	5	Phase 1 accuracy only.
Republic	GSM	2	NO	7/1/09		Republic County Communications Center	2	0	2	Phase 1 accuracy only.

(a)*

(b)**

(c)***

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Rice	GSM	2	NO	4/1/10		Rice County 9-1-1 Emergency Commun	1	0	1	Phase 1 accuracy only.	x
Riley	GSM	2	NO	9/28/09		RILEY COUNTY 911	3	0	3	Phase 1 accuracy only.	x
Saline	GSM	2	NO	6/8/09		SALINA POLICE DEPARTMENT	2	0	2	Phase 1 accuracy only.	x
Sumner	GSM	2	NO	7/28/09		SUMNER COUNTY 9-1-1	4	0	4	Phase 1 accuracy only.	x
Wabaunsee	GSM	2	NO	12/14/09		Wabaunsee County Sheriff	3	0	3	Phase 1 accuracy only.	x
Washington	GSM	2	NO	3/22/10		WASHINGTON COUNTY SHERIFF	1	0	1	Phase 1 accuracy only.	x
Woodson	GSM	2	NO	10/12/09		WOODSON COUNTY SHERIFFS OFFIC	2	0	2	Phase 1 accuracy only.	x
North Dakota											
McIntosh	CDMA_GSM	2	NO	4/5/11	4/5/11	North Dakota State Radio	1	1	1	Phase 2 compliant CDMA but not GSM	x
Ward	GSM	2	NO	4/5/11		Minot City-Ward County Central Dispatch	1	0	1		x
McHenry	CDMA_GSM	2	NO	4/5/11	4/5/11	North Dakota State Radio	1	1	1	Phase 2 compliant CDMA but not GSM	x
New Mexico											
Catron	CDMA_GSM	2	NO	10/30/09	10/30/09	Catron County Sheriff	3	3	3	Phase 2 compliant CDMA but not GSM	x
Colfax	CDMA_GSM	2	NO	9/25/09	9/25/09	Raton Police Department	3	4	4	Phase 2 compliant CDMA but not GSM	x
Grant	GSM	2	NO	6/2/09		Grant County Regional Dispatch	5	0	5	Phase 1 accuracy only.	x
Los Alamos	GSM	2	NO	4/25/08		Los Alamos County Police Dept	0	4	4	Phase 1 accuracy only.	x
Luna	GSM	2	NO	9/24/09		Luna County Central Dispatch	1	0	1	Phase 1 accuracy only.	x
Rio Arriba	CDMA_GSM	2	NO	11/18/08	10/28/09	Espanola-Rio Arriba 911	3	7	8	Phase 2 compliant CDMA but not GSM	x
Sandoval	CDMA_GSM	2	NO	11/12/08	10/29/09	Sandoval County Communications	5	4	5	Phase 2 compliant CDMA but not GSM	x
Taos - Red River	CDMA_GSM	2	NO	10/16/09	10/16/09	RED RIVER MARSHALL	1	1	2	Phase 2 compliant CDMA but not GSM	x
Nevada											
Churchill	CDMA_GSM	2	NO	6/15/09	9/22/09	Churchill County Sheriff	12	17	19	Phase 2 compliant CDMA but not GSM	x
Esmeralda	CDMA_GSM	2	NO	2/3/11	2/3/11	Nye Counry Sheriff-Beatty/Pahrump/Tonx	5	5	6	Phase 2 compliant CDMA but not GSM	x
Nye	CDMA_GSM	2	NO	2/3/11	2/3/11	Nye Counry Sheriff-Beatty/Pahrump/Tonx	6	6	8	Phase 2 compliant CDMA but not GSM	x
Washoe	CDMA_GSM	2	NO	2/17/11	2/17/11	City of Reno	1	1	1	Phase 2 compliant CDMA but not GSM	x
Oklahoma											
Greer	GSM	2	NO	4/7/09		GREER COUNTY SHERIFFS DEPARTM	1	0	1	Phase 1 accuracy only.	x
Kiowa	GSM	2	NO	4/7/09		HOBART POLICE DEPARTMENT	1	0	1	Phase 1 accuracy only.	x
Harmon	GSM	2	NO	4/7/09		HOLLIS POLICE DEPARTMENT	1	0	1	Phase 1 accuracy only.	x
Jackson	GSM	2	NO	4/7/09		ALTUS POLICE DEPARTMENT	5	0	5	Phase 1 accuracy only.	x
Tillman	GSM	2	NO	9/15/09		TILLMAN COUNTY SHERIFFS OFFICE	0	2	2	Phase 1 accuracy only.	x
Utah											
Beaver	CDMA_GSM	2	NO	6/28/11		Beaver County Sheriffs Office Dispatch	1	1	1	Phase 2 compliant CDMA but not GSM	x
Garfield	CDMA_GSM	2	NO	6/29/11		Garfield County Sheriffs Office Dispatch	3	3	3	Phase 2 compliant CDMA but not GSM	x
Kane	CDMA_GSM	2	In Progress			Kane County Sheriff	3	3	3	deployment completed in appx 6 mo	
San Juan	CDMA_GSM	2	In Progress			San Juan County Sheriff	6	5	6	deployment completed in appx 6 mo	
Wayne	CDMA_GSM	2	NO	6/21/11		Richfield Communications Center	3	3	3	Phase 2 compliant CDMA but not GSM	x

(a)* = Phase 2 infrastructure installed, insufficient triangulation to meet E911 accuracy thresholds

(b)** = Advised PSAP of insufficient triangulation; consent not to install Phase 2 infrastructure

(c)*** = Not Phase 2 compliant yet, but expect to be Phase 2 compliant w/in 6 months